December 14, 2015

Chair Mary Nichols and Board Members
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Final Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19

Dear Ms. Nichols and Board members:

On behalf of the 27 under-signed organizations and individuals, Green Schools Initiative welcomes the opportunity to submit comments on the *Final Draft Cap-and Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19*. **Collectively, our organizations represent more than 1.6 million parents, students, facility directors, school board members, school district administrators, environmental educators, and health and environmental organizations, and nearly all 1,000 school districts and county offices of education in California.** We advocate for K-12 public schools in California and are dedicated to ensuring that schools are community models of sustainability that contribute to achieving greenhouse gas reduction goals and that provide healthy, safe learning environments for *all* California students. Climate change is a children's issue: children are more vulnerable to heat-related illnesses, air pollution and asthma, and lack of access to safe outdoor spaces to play and learn.

We commend and thank the Air Resources Board for responding to public comments to include K-12 schools in the Investment Plan. We support the revisions in the Final Draft Investment Plan that include schools as "Potential Recipients" for "Draft Investment Concepts" for numerous topics under the three primary over-arching priorities of Transportation & Sustainable Communities, Clean Energy & Energy Efficiency, and Natural Resources & Waste Diversion. We also support the inclusion of schools within the Potential Cross-Cutting Approaches for Local Climate Action in Disadvantaged Communities (pp. 29-30), and Efficient Financing Mechanisms to Maximize Investment (p. 30-31). We appreciate the ARB's recognition that "Sustainable Schools" are an important component of "Sustainable Communities" as evidenced by the Final Draft Investment Plan's inclusion of schools in these areas.

While we support these changes, we also suggest some additional revisions that would better enable K-12 schools – especially those in disadvantaged communities – to access and utilize grants supported by the Greenhouse Gas Reduction Fund for projects that can produce results in the short-, medium- and long-terms.

We recommend the following:

1. Include California Department of Education on Advisory Committees – In the future, ARB and California Environmental Protection Agency should consult with and add the California Department of Education (CDE) to serve as a member on the Climate Action Team so that the K-12 education sector can provide input and comments and be better integrated into the AB32 implementation plans and considerations. CDE was not consulted by CalEPA or ARB, as evidenced by the list of consulted agencies (p.25). In addition, we recommend that California Department of Education also be added to the Strategic Growth Council so that the K-12 education sector can be better integrated into SB375 implementation, given that achieving goals for "Sustainable Communities" will require that schools be included in land-use planning, transportation, and other planning efforts. To date, schools and LEAs "have been virtually left out of California's state policy

framework on sustainable communities planning," including both SB375 and the Strategic Growth Council as well as AB32 – a glaring state disconnect considering that school facilities funding has been about 2/3 of all state general obligation bonds since the 1970s.[1]

2. Establish a Coordinated, Streamlined, and Integrated Approach for Efficient and Effective Financing and Program Delivery - We support the inclusion of schools under the "Cross-Cutting Approaches" (pp. 29-30) and the inclusion of schools as "Potential Recipients" of investments listed in the tables for each of the three primary investment concepts (Figures 12, 14, and 16). However, the application process for a single school district to apply to separate, multiple agencies for integrated projects within one district will be very cumbersome and create administrative and bureaucratic barriers that will undermine the goals of supporting greenhouse gas reduction projects at schools. We recommend that ARB develop – in consultation with CDE and other education stakeholders – a coordinated, streamlined, and integrated process for schools to apply for funds for "integrated projects for local climate action" to ensure that the funding and program delivery is effective and efficient. There are several options that can be considered. One option could focus on a single application process for school districts to access multiple grant programs to support integrated projects with coordinated review of applications by relevant agencies. A second option could focus on establishing a new grant program managed by a single agency like California Department of Education specifically targeting integrated greenhouse gas reduction projects for schools in disadvantaged communities (that would fund waste diversion, transportation, urban forestry, water conservation, etc all at one school or within one district). Such a grant program for sustainable schools could use the CDE's existing Green Ribbon Schools[2] framework that already identifies metrics for greenhouse gas reductions, energy and water savings, waste diversion, ecological schoolgrounds, environmental literacy, and more. Similar streamlined and integrated approaches should also be considered for other local projects at the community level to reduce the barriers. The lead agency could establish an inter-agency review project to review the relevant project components of the applications for integrated projects.

We recommend that ARB should revise the language for Section A2 "Efficient <u>and Effective</u> Financing Mechanisms to Maximize Investment" on p. 30 by adding text (underlined) as follows:

<u>To reduce barriers for these integrated projects for communities, school districts and Local Educational Agencies (LEAs), and local governments, State agency(ies) administering the funding should develop integrated, coordinated, and streamlined application processes and/or specific grant programs dedicated to integrated projects to ensure efficient and effective program delivery. For example, a community, LEA, or local government could have a single application for integrated projects submitted to a single State agency, which could then take the lead on inter-agency coordination and review of the relevant portions of the application. Or a specific funding program – which could include new grants, pooled project grants from multiple agencies and sources across relevant project themes (transportation, urban forestry, waste diversion, etc), rebates, revolving loan funds, loan guarantees, or other innovative financing mechanisms – could be focused specifically on integrated projects for communities, LEAs, and/or local governments.</u>

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[1] Jeff Vincent, California's K-12 Educational Infrastructure Investments: Leveraging the State's Role for Quality School Facilities in Sustainable Communities, University of California-Berkeley Center for Cities and Schools, 2012. http://citiesandschools.berkeley.edu/reports/CCS2012CAK12facilities.pdf, p. 18.

[2] California Department of Education, Green Ribbon Schools Award Program, www.cde.ca.gov/ls/fa/sf/greenribbonprog.asp

3. Support Truly "Integrated Projects" for Sustainable Schools with Multiple Components and Co-Benefits as Part of Sustainable Communities – We support the proposed "Cross-Cutting Approaches" and "Local Climate Action in Disadvantaged Communities" described in Section A1 on pp. 29-30. This approach to "integrated projects" should be further enhanced by including in the concept additional project types, including waste diversion and energy and water conservation. In addition, we support ARB's addition and inclusion of projects at local schools in this section. There are an estimated 125,000 acres of school grounds and 36,000 school buildings[3] (admittedly conservative estimate, given that LAUSD alone has more than 10,000 buildings[4]) that are perfect candidates for integrated approaches, with numerous potential integrated projects for sustainable schools in disadvantaged communities. There are numerous sustainability projects being implemented at California public schools that can be scaled up for measurable reductions in greenhouse gas reductions and improvements in sustainability. There are schools in disadvantaged communities in San Francisco Unified School Districts and Manteca Unified School District, for example, that are diverting upwards of 50% of their organic waste through composting and recycling upwards of 70% of paper waste through recycling, thereby reducing landfill methane emissions. In Oakland and Berkeley, California, the routes for bicycle boulevards and buffered bike lanes are being deliberately planned to pass schools to increase participation in Safe Routes to School and active transit. Schools in Los Angeles Unified School District have used California Department of Water Resources "Drought Response Outreach Program for Schools" (DROPS) grants to remove asphalt and increase permeable surfaces, reducing heat island effects and capturing stormwater runoff. These examples are ready to be scaled up at schools across California's disadvantaged communities.

We recommend that Section A1 on pp. 29-30 be revised as follows (revisions appear underlined):

"To help support local transformation through climate action in disadvantaged communities, a portion of the total GGRF proceeds could be identified for "integrated projects"—projects that support energy and transportation solutions, smart growth, urban forestry, <u>waste diversion, green infrastructure and stormwater capture</u>, and more—in a community. For example, a community could propose an integrated project that includes: affordable housing near transit; a new or improved transit line and service to connect the affordable housing to areas of employment <u>and schools</u>; zero emission buses, additional bus drivers, and training for its transit system; bicycle and walking paths <u>that deliberately connect to schools</u>; <u>recycling and composting programs, including schools</u>; <u>asphalt removal, including schools, to increase permeable surfaces and stormwater capture and reduce heat island effects</u>; and tree planting and subsequent tree maintenance in public areas such as local schools. To provide job training benefits, the community could utilize its conservation corps to implement some of these project components."

4. Support Investments for Zero Net Energy and Zero Net Water Schools – We support California's Renewable Energy and Energy Efficiency Goals and Targets (as summarized in Figure 13). New commercial construction and half of existing buildings, including schools, are targeted to be Zero Net Energy by 2030. We support investments to ensure K-12 schools will also achieve Zero Net Energy – ideally for both existing and new schools. K-12 schools have enormous potential for energy efficiency and solar, given the age of existing school buildings ripe for efficiency improvements and the large expanses of school roofs. We also support the concept of Zero Net Water for schools, where schools can strive to reduce potable water use to no more than annual rainfall through water conservation, rainwater harvesting, greywater, stormwater capture, and appropriate native landscaping. A residential development in Davis, California – West Village – has developed Zero Net Water plans.[5] Aggressive water conservation will also help reduce energy use, as the water-energy nexus is increasingly recognized. We support the inclusion of schools as Potential Recipients for Draft Investment

[3] Jeff Vincent, op cit.

[4] LAUSD Facilities Services Division, Facilities Key Facts, http://www.laschools.org/new-site/fingertip-facts/

[5] Kendra Olmos and Frank Loge, "Offsetting water conservation costs to achieve net-zero water use," Journal of American Water Works Association, 2013. Waternet.0077455.pdf

Concepts in Figure 14 under "Low Carbon Water System." We also recommend that schools be included as Potential Recipients under "Energy Efficiency and Renewable Energy" in Figure 14. While Prop 39 funds are succeeding in funding energy efficiency retrofits in schools, additional investments will be needed to fully achieve Zero Net Energy schools in California. Promoting solar energy on California schools is doubly effective because most schools' energy demand is much lower in the summer months when non-school energy demands and solar generation capacity are highest.

5. Recognize the Co-Benefits of Schools' Role in Promoting Sustainable Behaviors and Climate Literacy – In addition to the tangible, measurable greenhouse gas reductions that can be achieved by investing in projects at schools, we recommend that ARB recognize the important role that K-12 schools can and should play in reaching California residents, educating and informing Californians about sustainable behaviors, and teaching climate literacy to the next generation of Californians, as called for in California's "Blueprint for Environmental Literacy" issued in September 2015.[6] Transforming school campuses into community models of sustainability will not only reduce greenhouse gas emissions, they can be used as hands-on teaching tools that will educate and inspire students, teachers, parents, and staff to make well-informed choices in their behaviors to foster sustainability in their homes and communities beyond school. We recommend that funding for greenhouse gas reduction projects at schools also include an educational component, which could include descriptive plaques and interactive kiosks, as well as hands-on lessons taught in outdoor classrooms, showcasing, using and/or demonstrating the sustainability features (trees, green infrastructure, energy efficiency and renewables, water conservation, active transportation and transit, waste diversion, and more).

Climate change is a children's issue, as recognized by the California State PTA and American Academy of Pediatrics.[7] Healthy, sustainable, and green schools will contribute tangibly to helping achieve California's ambitious greenhouse gas reduction goals of reducing greenhouse gas emissions by 40% below 1990 levels by 2030. The 27 organizations and individuals signing this letter, representing nearly all 1,000 school districts in California, support reducing the carbon footprint and improving the sustainability of K-12 school buildings, grounds, and operations; promoting healthy, resilient communities; and teaching environmental and outdoor education and climate literacy. We believe that sustainable schools and environmental literacy are fundamental to California's health, prosperity, and security. Investing in greenhouse gas reduction projects at schools will help solve the growing climate problems we face now, while also preparing our children to be the environmental leaders and engaged community members of tomorrow. Thank you for ARB's revisions to the Final Draft of the Second Investment Plan 2016-2019 so that K-12 schools are now included in some of the concepts for cap-and-trade proceeds investments. We thank you for considering our additional comments to further strengthen the efforts to include schools as part of California's solution for mitigating climate change.

Sincerely,

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On behalf of the following 26 organizations:

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[6] http://www.cde.ca.gov/pd/ca/sc/environliteracyblueprint.asp

[7] California State PTA Resolution, May 2015. downloads.capta.org/res/ClimateChange_is_a_ChildrensIssue.pdf. American Academy of Pediatrics, October 2015. pediatrics.aappublications.org/content/early/2015/10/21/peds.2015-3232

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